

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

UNITED STATES OF AMERICA

V.

ROBERT MOORE

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No. 4:18CR00198 BRW

**DEFENDANT'S MOTION IN LIMINE TO REMOVE ANY REFERENCE  
TO PRIOR ARREST OR CONVICTIONS OF THE DEFENDANT  
FROM THE AUDIO RECORDING OF THE TRAFFIC STOP**

Comes now, Defendant, **Robert Moore**, by and through his attorney, Hugh R. Laws, and for his Motion in Limine, states as follows:

1. The Defendant was arrested on March 22, 2018 and charged in the case herein. At the time of the stop, the police officer had a microphone and patrol car camera which videotaped and audio recorded a portion of the encounter.

2. The Defendant objects to the reference to any prior arrests convictions of the Defendant being or admitted into evidence in any stage of the proceedings by the Government. The Government certainly cannot use under any circumstance the Defendant's prior arrests or convictions in their case in chief under Federal Rules of Evidence 609. The Defendant has previously argued in his Motion in Limine (Doc. 14) that the Government should not be able to use this in any stage of the proceedings. The Defendant restates those objections here. Certainly the audio portion of the stop, as well as, any portion of statements made by the Defendant dealing with the Defendant's previous arrests or convictions should not be allowed in the case in chief. Any portion of the stop dealing with the same should be dubbed over or muted during the appropriate times that they appear in the audio of the stop as well as the interview of the Defendant.

WHEREFORE, PREMISES CONSIDERED, the Defendant's Motion in Limine should be granted.

RESPECTFULLY SUBMITTED,  
ROBERT MOORE, DEFENDANT

BY: 

HUGH R. LAWS

Arkansas Bar No. 88129

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**CERTIFICATE OF SERVICE**

I, Hugh R. Laws, attorney for the Defendant, do hereby certify that I have served a copy of the foregoing Response to Motion on Benecia Moore, AUSA, via ECF filing, on this 31<sup>st</sup> day of January, 2020.



HUGH R. LAWS